



Benjamin W. Hulse  
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October 12, 2017

**VIA EMAIL AND U.S. MAIL**

Dae Y. Lee  
Bernstein Liebhard LLP  
10 E. 40th Street  
New York, NY 10016  
[dlee@bernlieb.com](mailto:dlee@bernlieb.com)

*Re: In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*  
MDL No. 2666 – Deficiencies in Plaintiff Fact Sheet for Individual Case  
*Warren v. 3M Company et al et al* Case No.: 0:17-cv-01027-JNE-FLN

Dear Counsel:

We are in receipt of the Plaintiff Fact Sheet (PFS) for the above-captioned matter. The PFS has core deficiencies, as set forth in the enclosed report.

Paragraph 4 of Pretrial Order No. 14 defines core deficiencies as “a lack of response to all questions in Section I, Section II, and Section III; Section IV, questions 1, 3, 7, 8, 9, 10; Section V, questions 5, 6, and 7; Section VI, questions 1, 3, 6, 7, 8, and 9; Section VII, questions 1 and 2; Section 8, question 2; Section IX, questions 1, 3, and 4, or lack of signed medical authorizations.” Paragraph 3 further requires a signed verification.

In addition, the instructions on the PFS form prohibit leaving spaces blank and provide as follows: “If a question is not applicable to you, please state ‘Not Applicable’ or ‘N/A.’” In our review, many deficiencies resulted from a plaintiff leaving one or more spaces blank.

Pursuant to paragraph 6 of PTO 14, within 3 weeks of the date of this letter, you must respond in writing by either (1) curing the deficiencies (by serving a revised, verified PFS through Plaintiffs’ portal); (2) disputing the deficiencies and setting forth the reasons the PFS is not deficient; or (3) explaining why the deficiencies cannot be timely cured. When serving a revised, verified PFS through Plaintiff’s portal, you do not need to resubmit documents that were previously served with the original PFS.

Sincerely,

s/ Benjamin W. Hulse

Benjamin W. Hulse

cc: Plaintiffs’ Co-Lead Counsel  
Enclosure

Title "Warren \_Michael \_017-cv-01027\_1\_Warren \_Michael \_017-cv-01027\_1"

Warren \_Michael  
\_017-cv-  
01027\_1\_Warren  
\_Michael \_017-cv-  
01027\_1

PLAINTIFFS' LAST NAME - Warren  
PLAINTIFFS' FIRST NAME - Michael  
CASE NO. - 0:17-cv-01027  
SECTION I (CASE INFORMATION) -  
SECTION II (PERSONAL INFORMATION) - Incomplete  
SECTION II - INCOMPLETE QUESTIONS - 10  
SECTION III (SURGERY INFORMATION) -  
SECTION IV - 1 (VITAL STATISTICS) -  
SECTION IV - 10 (DRUG/ALCOHOL) -  
SECTION IV - 3 (HEALTHCARE PROVIDERS) -  
SECTION IV - 7 (PHARMACIES/DRUGSTORES) -  
SECTION IV - 8 (DENTAL PROCEDURES) - Incomplete  
SECTION IV - 9 (TOBACCO) -  
SECTION IX - 1 (CONSORTIUM NAME ETC.) -  
SECTION IX - 3 (RESIDENCES) -  
SECTION IX - 4 (MARRIED) -  
SECTION V - 5 (DISABILITY CLAIMS) -  
SECTION V - 6 (LAWSUITS) -  
SECTION V - 7 (BANKRUPTCY) -  
SECTION VI - 1 (PHYSICAL INJURY) -  
SECTION VI - 3 (EMOTIONAL DISTRESS) -  
SECTION VI - 6 (WARNINGS) -  
SECTION VI - 7 (3M/ARIZANT COMMUNICATIONS) -  
SECTION VI - 8 (3M/ARIZANT WARRANTY) -  
SECTION VI - 9 (AUGUSTINE) -  
SECTION VII - 1 (LOST PAST WAGES) -  
SECTION VII - 2 (LOST FUTURE WAGES) -  
SECTION VIII - 2 (VERBAL/WRITTEN STATEMENT) -  
X.01 - SIGNED AUTHORIZATION -  
X.02.D - DOCUMENTS - SIGNED VERIFICATION -  
I.03.B - PLAINTIFFS' COUNSEL'S FIRM - Bernstein Liebhard LLP  
I.03.E - PLAINTIFFS' COUNSEL'S EMAIL - dburke@bernlieb.comdburke@bernlieb.comdburke@bernlieb.com,  
dlee@bernlieb.com



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September 18, 2017

**VIA EMAIL AND U.S. MAIL**

David Hodges  
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4409 Montrose Blvd, Ste 200  
Houston, TX, 77006  
[mtg@kennedyhodges.com](mailto:mtg@kennedyhodges.com)

Re: *In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*  
MDL No. 2666 – Deficiencies in Amended Plaintiff Fact Sheet  
*Petrakis v. 3M Company et al* Case No.: 0:17-cv-01082-JNE-FLN

Dear Counsel:

We are in receipt of the amended Plaintiff Fact Sheet (PFS) for the above-captioned matter. The PFS still has core deficiencies, as set forth in the enclosed report.

Paragraph 4 of Pretrial Order No. 14 defines core deficiencies as “a lack of response to all questions in Section I, Section II, and Section III; Section IV, questions 1, 3, 7, 8, 9, 10; Section V, questions 5, 6, and 7; Section VI, questions 1, 3, 6, 7, 8, and 9; Section VII, questions 1 and 2; Section 8, question 2; Section IX, questions 1, 3, and 4, or lack of signed medical authorizations.” Paragraph 3 further requires a signed verification.

In addition, the instructions on the PFS form prohibit leaving spaces blank and provide as follows: “If a question is not applicable to you, please state ‘Not Applicable’ or ‘N/A.’” In our review, many deficiencies resulted from a plaintiff leaving one or more spaces blank.

Pursuant to paragraph 6 of PTO 14, within 3 weeks of the date of this letter, you must respond in writing by either (1) curing the deficiencies (by serving a further revised, verified PFS through Plaintiffs’ portal); (2) disputing the deficiencies and setting forth the reasons the PFS is not deficient; or (3) explaining why the deficiencies cannot be timely cured. When serving a revised, verified PFS through Plaintiff’s portal, you do not need to resubmit documents that were previously served with the original PFS.

Sincerely,

s/ Benjamin W. Hulse

Benjamin W. Hulse

cc: Plaintiffs’ Co-Lead Counsel  
Enclosure

Title "Petrakis\_Gus\_17-cv-1082\_2\_Petrakis\_Gus\_17-cv-1082\_2"

Petrakis\_Gus\_17-cv-  
1082\_1\_Petrakis\_Gus\_  
17-cv-1082\_1

PLAINTIFFS' LAST NAME - Petrakis  
PLAINTIFFS' FIRST NAME - Gus  
CASE NO. - 17-cv-1082  
SECTION I (CASE INFORMATION) -  
SECTION II (PERSONAL INFORMATION) - Incomplete  
SECTION II - INCOMPLETE QUESTIONS - 01, 02, 03, 06, 08, 09, 10, 11, 12, 13  
SECTION III (SURGERY INFORMATION) -  
SECTION IV - 1 (VITAL STATISTICS) - Incomplete  
SECTION IV - 10 (DRUG/ALCOHOL) -  
SECTION IV - 3 (HEALTHCARE PROVIDERS) -  
SECTION IV - 7 (PHARMACIES/DRUGSTORES) - Incomplete  
SECTION IV - 8 (DENTAL PROCEDURES) - Incomplete  
SECTION IV - 9 (TOBACCO) - Incomplete  
SECTION IX - 1 (CONSORTIUM NAME ETC.) -  
SECTION IX - 3 (RESIDENCES) -  
SECTION IX - 4 (MARRIED) -  
SECTION V - 5 (DISABILITY CLAIMS) - Incomplete  
SECTION V - 6 (LAWSUITS) - Incomplete  
SECTION V - 7 (BANKRUPTCY) - Incomplete  
SECTION VI - 1 (PHYSICAL INJURY) - Incomplete  
SECTION VI - 3 (EMOTIONAL DISTRESS) - Incomplete  
SECTION VI - 6 (WARNINGS) -  
SECTION VI - 7 (3M/ARIZANT COMMUNICATIONS) -  
SECTION VI - 8 (3M/ARIZANT WARRANTY) -  
SECTION VI - 9 (AUGUSTINE) -  
SECTION VII - 1 (LOST PAST WAGES) -  
SECTION VII - 2 (LOST FUTURE WAGES) -  
SECTION VIII - 2 (VERBAL/WRITTEN STATEMENT) - Incomplete  
X.01 - SIGNED AUTHORIZATION - Incomplete  
X.02.D - DOCUMENTS - SIGNED VERIFICATION - Incomplete  
I.03.B - PLAINTIFFS' COUNSEL'S FIRM - Kennedy Hodges, L.L.P.  
I.03.E - PLAINTIFFS' COUNSEL'S EMAIL - mtg@kennedyhodes.com





Benjamin W. Hulse  
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September 28, 2017

**VIA EMAIL AND U.S. MAIL**

David W. Hodges  
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4409 Montrose Blvd, Ste 200  
Houston, TX, 77006  
[mtg@kennedyhodges.com](mailto:mtg@kennedyhodges.com)

Re: *In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*  
MDL No. 2666 – Deficiencies in Plaintiff Fact Sheet for Individual Case  
*Sellers v. 3M Company et al et al* Case No.: 0:17-cv-01879-JNE-FLN

Dear Counsel:

We are in receipt of the Plaintiff Fact Sheet (PFS) for the above-captioned matter. The PFS has core deficiencies, as set forth in the enclosed report.

Paragraph 4 of Pretrial Order No. 14 defines core deficiencies as “a lack of response to all questions in Section I, Section II, and Section III; Section IV, questions 1, 3, 7, 8, 9, 10; Section V, questions 5, 6, and 7; Section VI, questions 1, 3, 6, 7, 8, and 9; Section VII, questions 1 and 2; Section 8, question 2; Section IX, questions 1, 3, and 4, or lack of signed medical authorizations.” Paragraph 3 further requires a signed verification.

In addition, the instructions on the PFS form prohibit leaving spaces blank and provide as follows: “If a question is not applicable to you, please state ‘Not Applicable’ or ‘N/A.’” In our review, many deficiencies resulted from a plaintiff leaving one or more spaces blank.

Pursuant to paragraph 6 of PTO 14, within 3 weeks of the date of this letter, you must respond in writing by either (1) curing the deficiencies (by serving a revised, verified PFS through Plaintiffs’ portal); (2) disputing the deficiencies and setting forth the reasons the PFS is not deficient; or (3) explaining why the deficiencies cannot be timely cured. When serving a revised, verified PFS through Plaintiff’s portal, you do not need to resubmit documents that were previously served with the original PFS.

Sincerely,

s/ Benjamin W. Hulse

Benjamin W. Hulse

cc: Plaintiffs’ Co-Lead Counsel  
Enclosure

Title "Sellers\_William\_17-cv-1879\_1\_Sellers\_William\_17-cv-1879\_1"

Sellers\_William\_17-  
cv-  
1879\_1\_Sellers\_Willia  
m\_17-cv-1879\_1

PLAINTIFFS' LAST NAME - Sellers  
PLAINTIFFS' FIRST NAME - William  
CASE NO. - 17-cv-1879  
SECTION I (CASE INFORMATION) -  
SECTION II (PERSONAL INFORMATION) - Incomplete  
SECTION II - INCOMPLETE QUESTIONS - 01, 02, 03, 06, 08, 09, 10, 11, 12  
SECTION III (SURGERY INFORMATION) -  
SECTION IV - 1 (VITAL STATISTICS) - Incomplete  
SECTION IV - 10 (DRUG/ALCOHOL) - Incomplete  
SECTION IV - 3 (HEALTHCARE PROVIDERS) -  
SECTION IV - 7 (PHARMACIES/DRUGSTORES) - Incomplete  
SECTION IV - 8 (DENTAL PROCEDURES) - Incomplete  
SECTION IV - 9 (TOBACCO) - Incomplete  
SECTION IX - 1 (CONSORTIUM NAME ETC.) -  
SECTION IX - 3 (RESIDENCES) -  
SECTION IX - 4 (MARRIED) -  
SECTION V - 5 (DISABILITY CLAIMS) - Incomplete  
SECTION V - 6 (LAWSUITS) - Incomplete  
SECTION V - 7 (BANKRUPTCY) - Incomplete  
SECTION VI - 1 (PHYSICAL INJURY) - Incomplete  
SECTION VI - 3 (EMOTIONAL DISTRESS) - Incomplete  
SECTION VI - 6 (WARNINGS) -  
SECTION VI - 7 (3M/ARIZANT COMMUNICATIONS) -  
SECTION VI - 8 (3M/ARIZANT WARRANTY) -  
SECTION VI - 9 (AUGUSTINE) -  
SECTION VII - 1 (LOST PAST WAGES) - Incomplete  
SECTION VII - 2 (LOST FUTURE WAGES) - Incomplete  
SECTION VIII - 2 (VERBAL/WRITTEN STATEMENT) - Incomplete  
X.01 - SIGNED AUTHORIZATION - Incomplete  
X.02.D - DOCUMENTS - SIGNED VERIFICATION - Incomplete  
I.03.B - PLAINTIFFS' COUNSEL'S FIRM - Kennedy Hodges  
I.03.E - PLAINTIFFS' COUNSEL'S EMAIL - mtg@kennedyhodges.com



Benjamin W. Hulse  
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October 12, 2017

**VIA EMAIL AND U.S. MAIL**

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[mtg@kennedyhodges.com](mailto:mtg@kennedyhodges.com)

Re: *In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*  
MDL No. 2666 – Deficiencies in Plaintiff Fact Sheet for Individual Case  
*Osborne v. 3M Company et al et al* Case No.: 0:17-cv-02099-JNE-FLN

Dear Counsel:

We are in receipt of the Plaintiff Fact Sheet (PFS) for the above-captioned matter. The PFS has core deficiencies, as set forth in the enclosed report.

Paragraph 4 of Pretrial Order No. 14 defines core deficiencies as “a lack of response to all questions in Section I, Section II, and Section III; Section IV, questions 1, 3, 7, 8, 9, 10; Section V, questions 5, 6, and 7; Section VI, questions 1, 3, 6, 7, 8, and 9; Section VII, questions 1 and 2; Section 8, question 2; Section IX, questions 1, 3, and 4, or lack of signed medical authorizations.” Paragraph 3 further requires a signed verification.

In addition, the instructions on the PFS form prohibit leaving spaces blank and provide as follows: “If a question is not applicable to you, please state ‘Not Applicable’ or ‘N/A.’” In our review, many deficiencies resulted from a plaintiff leaving one or more spaces blank.

Pursuant to paragraph 6 of PTO 14, within 3 weeks of the date of this letter, you must respond in writing by either (1) curing the deficiencies (by serving a revised, verified PFS through Plaintiffs’ portal); (2) disputing the deficiencies and setting forth the reasons the PFS is not deficient; or (3) explaining why the deficiencies cannot be timely cured. When serving a revised, verified PFS through Plaintiff’s portal, you do not need to resubmit documents that were previously served with the original PFS.

Sincerely,

s/ Benjamin W. Hulse

Benjamin W. Hulse

cc: Plaintiffs’ Co-Lead Counsel  
Enclosure

Title "Osborne\_Vanessa\_17-cv-2099\_1\_Osborne\_Vanessa\_17-cv-2099\_1"

Osborne\_Vanessa\_17-  
cv-  
2099\_1\_Osborne\_Vane  
ssa\_17-cv-2099\_1

PLAINTIFFS' LAST NAME - Osborne  
PLAINTIFFS' FIRST NAME - Vanessa  
CASE NO. - 17-cv-2099  
SECTION I (CASE INFORMATION) -  
SECTION II (PERSONAL INFORMATION) - Incomplete  
SECTION II - INCOMPLETE QUESTIONS - 01, 02, 03, 06, 08, 09, 10, 11, 12  
SECTION III (SURGERY INFORMATION) - Incomplete  
SECTION III - INCOMPLETE QUESTIONS - 03  
SECTION IV - 1 (VITAL STATISTICS) - Incomplete  
SECTION IV - 10 (DRUG/ALCOHOL) - Incomplete  
SECTION IV - 3 (HEALTHCARE PROVIDERS) - Incomplete  
SECTION IV - 7 (PHARMACIES/DRUGSTORES) - Incomplete  
SECTION IV - 8 (DENTAL PROCEDURES) - Incomplete  
SECTION IV - 9 (TOBACCO) - Incomplete  
SECTION IX - 1 (CONSORTIUM NAME ETC.) - Incomplete  
SECTION IX - 3 (RESIDENCES) - Incomplete  
SECTION IX - 4 (MARRIED) - Incomplete  
SECTION V - 5 (DISABILITY CLAIMS) - Incomplete  
SECTION V - 6 (LAWSUITS) - Incomplete  
SECTION V - 7 (BANKRUPTCY) - Incomplete  
SECTION VI - 1 (PHYSICAL INJURY) - Incomplete  
SECTION VI - 3 (EMOTIONAL DISTRESS) - Incomplete  
SECTION VI - 6 (WARNINGS) - Incomplete  
SECTION VI - 7 (3M/ARIZANT COMMUNICATIONS) - Incomplete  
SECTION VI - 8 (3M/ARIZANT WARRANTY) - Incomplete  
SECTION VI - 9 (AUGUSTINE) - Incomplete  
SECTION VII - 1 (LOST PAST WAGES) - Incomplete  
SECTION VII - 2 (LOST FUTURE WAGES) - Incomplete  
SECTION VIII - 2 (VERBAL/WRITTEN STATEMENT) - Incomplete  
X.01 - SIGNED AUTHORIZATION - Incomplete  
X.02.D - DOCUMENTS - SIGNED VERIFICATION - Incomplete  
I.03.B - PLAINTIFFS' COUNSEL'S FIRM - Kennedy Hodges  
I.03.E - PLAINTIFFS' COUNSEL'S EMAIL - mtg@kennedyhodges.com



August 24, 2017

Benjamin W. Hulse  
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**VIA EMAIL AND U.S. MAIL**

Daniel A. Nigh  
Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, P.A.  
316 South Baylen St. Suite 600  
Pensacola, Florida 32502  
[dnigh@levinlaw.com](mailto:dnigh@levinlaw.com)

Re: *In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*  
MDL No. 2666 – Deficiencies in Amended Plaintiff Fact Sheet  
*Grooms v. 3M Company* Case No.: 00:17-cv-00343-JNE-FLN

Dear Counsel:

We are in receipt of the second amended Plaintiff Fact Sheet (PFS) for the above-captioned matter. The second amended PFS still has core deficiencies, as set forth in the enclosed report.

Paragraph 4 of Pretrial Order No. 14 defines core deficiencies as “a lack of response to all questions in Section I, Section II, and Section III; Section IV, questions 1, 3, 7, 8, 9, 10; Section V, questions 5, 6, and 7; Section VI, questions 1, 3, 6, 7, 8, and 9; Section VII, questions 1 and 2; Section 8, question 2; Section IX, questions 1, 3, and 4, or lack of signed medical authorizations.” Paragraph 3 further requires a signed verification.

In addition, the instructions on the PFS form prohibit leaving spaces blank and provide as follows: “If a question is not applicable to you, please state ‘Not Applicable’ or ‘N/A.’” In our review, many deficiencies resulted from a plaintiff leaving one or more spaces blank.

Pursuant to paragraph 6 of PTO 14, within 3 weeks of the date of this letter, you must respond in writing by either (1) curing the deficiencies (by serving a further revised, verified PFS through Plaintiffs’ portal); (2) disputing the deficiencies and setting forth the reasons the PFS is not deficient; or (3) explaining why the deficiencies cannot be timely cured. When serving a revised, PFS through Plaintiff’s portal, you do not need to resubmit documents that were previously served with the original and/or any amended PFS. An updated verification is required, however, to be served along with the amended PFS.

Sincerely,

s/ Benjamin W. Hulse

Benjamin W. Hulse

cc: Plaintiffs’ Co-Lead Counsel  
Enclosure

Title "Grooms\_Noble\_017-cv-00343\_1\_Grooms\_Noble\_017-cv-00343\_1"

Grooms\_Noble\_017-  
cv-  
00343\_1\_Grooms\_Nob  
le\_017-cv-00343\_1

PLAINTIFFS' LAST NAME - Grooms  
PLAINTIFFS' FIRST NAME - Noble  
CASE NO. - 0:17-cv-00343  
SECTION I (CASE INFORMATION) -  
SECTION II (PERSONAL INFORMATION) - Incomplete  
SECTION II - INCOMPLETE QUESTIONS - 01, 02, 03, 06, 08, 09, 10  
SECTION III (SURGERY INFORMATION) - Incomplete  
SECTION III - INCOMPLETE QUESTIONS - 03  
SECTION IV - 1 (VITAL STATISTICS) -  
SECTION IV - 10 (DRUG/ALCOHOL) -  
SECTION IV - 3 (HEALTHCARE PROVIDERS) - Incomplete  
SECTION IV - 7 (PHARMACIES/DRUGSTORES) - Incomplete  
SECTION IV - 8 (DENTAL PROCEDURES) -  
SECTION IV - 9 (TOBACCO) -  
SECTION IX - 1 (CONSORTIUM NAME ETC.) -  
SECTION IX - 3 (RESIDENCES) -  
SECTION IX - 4 (MARRIED) -  
SECTION V - 5 (DISABILITY CLAIMS) -  
SECTION V - 6 (LAWSUITS) -  
SECTION V - 7 (BANKRUPTCY) -  
SECTION VI - 1 (PHYSICAL INJURY) - Incomplete  
SECTION VI - 3 (EMOTIONAL DISTRESS) - Incomplete  
SECTION VI - 6 (WARNINGS) - Incomplete  
SECTION VI - 7 (3M/ARIZANT COMMUNICATIONS) - Incomplete  
SECTION VI - 8 (3M/ARIZANT WARRANTY) - Incomplete  
SECTION VI - 9 (AUGUSTINE) -  
SECTION VII - 1 (LOST PAST WAGES) -  
SECTION VII - 2 (LOST FUTURE WAGES) -  
SECTION VIII - 2 (VERBAL/WITTEN STATEMENT) -  
X.01 - SIGNED AUTHORIZATION - Incomplete  
X.02.D - DOCUMENTS - SIGNED VERIFICATION - Incomplete  
I.03.B - PLAINTIFFS' COUNSEL'S FIRM - Levin, Papantonio  
I.03.E - PLAINTIFFS' COUNSEL'S EMAIL - dnigh@levinlaw.com



Benjamin W. Hulse  
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October 03, 2017

**VIA EMAIL AND U.S. MAIL**

Seth Webb  
Brown & Crouppen, PC  
211 North Broadway, Suite 1600  
St. Louis, MO 63102  
[sethw@getbc.com](mailto:sethw@getbc.com)

Re: *In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*  
MDL No. 2666 – Deficiencies in Amended Plaintiff Fact Sheet  
*Johnson v. 3M Company et al* Case No.: 0:17-cv-00640-JNE-FLN

Dear Counsel:

We are in receipt of the second amended Plaintiff Fact Sheet (PFS) for the above-captioned matter. The second amended PFS still has core deficiencies, as set forth in the enclosed report.

Paragraph 4 of Pretrial Order No. 14 defines core deficiencies as “a lack of response to all questions in Section I, Section II, and Section III; Section IV, questions 1, 3, 7, 8, 9, 10; Section V, questions 5, 6, and 7; Section VI, questions 1, 3, 6, 7, 8, and 9; Section VII, questions 1 and 2; Section 8, question 2; Section IX, questions 1, 3, and 4, or lack of signed medical authorizations.” Paragraph 3 further requires a signed verification.

In addition, the instructions on the PFS form prohibit leaving spaces blank and provide as follows: “If a question is not applicable to you, please state ‘Not Applicable’ or ‘N/A.’” In our review, many deficiencies resulted from a plaintiff leaving one or more spaces blank.

Pursuant to paragraph 6 of PTO 14, within 3 weeks of the date of this letter, you must respond in writing by either (1) curing the deficiencies (by serving a further revised, verified PFS through Plaintiffs’ portal); (2) disputing the deficiencies and setting forth the reasons the PFS is not deficient; or (3) explaining why the deficiencies cannot be timely cured. When serving a revised, PFS through Plaintiff’s portal, you do not need to resubmit documents that were previously served with the original and/or any amended PFS. An updated verification is required, however, to be served along with the amended PFS.

Sincerely,

s/ Benjamin W. Hulse

Benjamin W. Hulse

cc: Plaintiffs’ Co-Lead Counsel  
Enclosure



Title "Johnson\_Carolyn\_017-cv-640\_1\_Johnson\_Carolyn\_017-cv-640\_1"

Johnson\_Carolyn\_017  
-cv-  
640\_1\_Johnson\_Carol  
yn\_017-cv-640\_1

PLAINTIFFS' LAST NAME - Johnson  
PLAINTIFFS' FIRST NAME - Carolyn D.  
CASE NO. - 0:17-cv-640  
SECTION I (CASE INFORMATION) -  
SECTION II (PERSONAL INFORMATION) -  
SECTION III (SURGERY INFORMATION) - Incomplete  
SECTION III - INCOMPLETE QUESTIONS - 03  
SECTION IV - 1 (VITAL STATISTICS) -  
SECTION IV - 10 (DRUG/ALCOHOL) -  
SECTION IV - 3 (HEALTHCARE PROVIDERS) -  
SECTION IV - 7 (PHARMACIES/DRUGSTORES) -  
SECTION IV - 8 (DENTAL PROCEDURES) -  
SECTION IV - 9 (TOBACCO) -  
SECTION IX - 1 (CONSORTIUM NAME ETC.) -  
SECTION IX - 3 (RESIDENCES) -  
SECTION IX - 4 (MARRIED) -  
SECTION V - 5 (DISABILITY CLAIMS) -  
SECTION V - 6 (LAWSUITS) -  
SECTION V - 7 (BANKRUPTCY) -  
SECTION VI - 1 (PHYSICAL INJURY) -  
SECTION VI - 3 (EMOTIONAL DISTRESS) -  
SECTION VI - 6 (WARNINGS) -  
SECTION VI - 7 (3M/ARIZANT COMMUNICATIONS) -  
SECTION VI - 8 (3M/ARIZANT WARRANTY) -  
SECTION VI - 9 (AUGUSTINE) -  
SECTION VII - 1 (LOST PAST WAGES) -  
SECTION VII - 2 (LOST FUTURE WAGES) -  
SECTION VIII - 2 (VERBAL/WRITTEN STATEMENT) -  
X.01 - SIGNED AUTHORIZATION -  
X.02.D - DOCUMENTS - SIGNED VERIFICATION -  
X.02.D.1 - DOCUMENTS - SIGNED VERIFICATION (NON-PFS RESPONSE) -  
I.03.B - PLAINTIFFS' COUNSEL'S FIRM - Brown & Crouppen  
I.03.E - PLAINTIFFS' COUNSEL'S EMAIL - sethw@getbc.com





October 12, 2017

Benjamin W. Hulse  
Direct Dial: 612-343-3256  
E-Mail: [bhulse@blackwellburke.com](mailto:bhulse@blackwellburke.com)

**VIA EMAIL AND U.S. MAIL**

Daniel A. Nigh  
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316 South Baylen St. Suite 400  
Pensacola, Florida 32502  
[dnigh@levinlaw.com](mailto:dnigh@levinlaw.com)

Re: *In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*  
MDL No. 2666 – Deficiencies in Amended Plaintiff Fact Sheet  
*Garcia v. 3M Company* Case No.: 0:17-cv-00711-JNE-FLN

Dear Counsel:

We are in receipt of the second amended Plaintiff Fact Sheet (PFS) for the above-captioned matter. The second amended PFS still has core deficiencies, as set forth in the enclosed report.

Paragraph 4 of Pretrial Order No. 14 defines core deficiencies as “a lack of response to all questions in Section I, Section II, and Section III; Section IV, questions 1, 3, 7, 8, 9, 10; Section V, questions 5, 6, and 7; Section VI, questions 1, 3, 6, 7, 8, and 9; Section VII, questions 1 and 2; Section 8, question 2; Section IX, questions 1, 3, and 4, or lack of signed medical authorizations.” Paragraph 3 further requires a signed verification.

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Pursuant to paragraph 6 of PTO 14, within 3 weeks of the date of this letter, you must respond in writing by either (1) curing the deficiencies (by serving a further revised, verified PFS through Plaintiffs’ portal); (2) disputing the deficiencies and setting forth the reasons the PFS is not deficient; or (3) explaining why the deficiencies cannot be timely cured. When serving a revised, PFS through Plaintiff’s portal, you do not need to resubmit documents that were previously served with the original and/or any amended PFS. An updated verification is required, however, to be served along with the amended PFS.

Sincerely,

s/ Benjamin W. Hulse

Benjamin W. Hulse

cc: Plaintiffs’ Co-Lead Counsel  
Enclosure

Title "Garcia\_Gilbert\_017-cv-00711\_1\_Garcia\_Gilbert\_017-cv-00711\_1"

Garcia\_Gilbert\_017-  
cv-  
00711\_1\_Garcia\_Gilber  
t\_017-cv-00711\_1

PLAINTIFFS' LAST NAME - Garcia  
PLAINTIFFS' FIRST NAME - Gilbert  
CASE NO. - 0:17-cv-00711  
SECTION I (CASE INFORMATION) - Incomplete  
SECTION I - INCOMPLETE QUESTIONS - 04  
SECTION II (PERSONAL INFORMATION) - Incomplete  
SECTION II - INCOMPLETE QUESTIONS - 01, 02, 03, 05, 06, 08, 09, 10  
SECTION III (SURGERY INFORMATION) - Incomplete  
SECTION III - INCOMPLETE QUESTIONS - 04, 05  
SECTION IV - 1 (VITAL STATISTICS) - Incomplete  
SECTION IV - 10 (DRUG/ALCOHOL) - Incomplete  
SECTION IV - 3 (HEALTHCARE PROVIDERS) -  
SECTION IV - 7 (PHARMACIES/DRUGSTORES) - Incomplete  
SECTION IV - 8 (DENTAL PROCEDURES) - Incomplete  
SECTION IV - 9 (TOBACCO) - Incomplete  
SECTION IX - 1 (CONSORTIUM NAME ETC.) -  
SECTION IX - 3 (RESIDENCES) -  
SECTION IX - 4 (MARRIED) -  
SECTION V - 5 (DISABILITY CLAIMS) -  
SECTION V - 6 (LAWSUITS) -  
SECTION V - 7 (BANKRUPTCY) -  
SECTION VI - 1 (PHYSICAL INJURY) - Incomplete  
SECTION VI - 3 (EMOTIONAL DISTRESS) -  
SECTION VI - 6 (WARNINGS) -  
SECTION VI - 7 (3M/ARIZANT COMMUNICATIONS) -  
SECTION VI - 8 (3M/ARIZANT WARRANTY) -  
SECTION VI - 9 (AUGUSTINE) -  
SECTION VII - 1 (LOST PAST WAGES) -  
SECTION VII - 2 (LOST FUTURE WAGES) -  
SECTION VIII - 2 (VERBAL/WRITTEN STATEMENT) - Incomplete  
X.01 - SIGNED AUTHORIZATION - Incomplete  
X.02.D - DOCUMENTS - SIGNED VERIFICATION - Incomplete  
I.03.B - PLAINTIFFS' COUNSEL'S FIRM - Levin, Papantonio, Thomas, Mitchell, Rafferty, Proctor P.A.  
I.03.E - PLAINTIFFS' COUNSEL'S EMAIL - dnigh@levinlaw.com



October 12, 2017

Benjamin W. Hulse  
Direct Dial: 612-343-3256  
E-Mail: [bhulse@blackwellburke.com](mailto:bhulse@blackwellburke.com)

**VIA EMAIL AND U.S. MAIL**

Daniel A. Nigh  
Levin, Papantonio, Thomas, Mitchell, Rafferty, Proctor P.A.  
316 South Baylen St. Suite 400  
Pensacola, Florida 32502  
[dnigh@levinlaw.com](mailto:dnigh@levinlaw.com)

Re: *In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*  
MDL No. 2666 – Deficiencies in Amended Plaintiff Fact Sheet  
*Gruetzmacher v. 3M Company* Case No.: 0:17-cv-00998-JNE-FLN

Dear Counsel:

We are in receipt of the second amended Plaintiff Fact Sheet (PFS) for the above-captioned matter. The second amended PFS still has core deficiencies, as set forth in the enclosed report.

Paragraph 4 of Pretrial Order No. 14 defines core deficiencies as “a lack of response to all questions in Section I, Section II, and Section III; Section IV, questions 1, 3, 7, 8, 9, 10; Section V, questions 5, 6, and 7; Section VI, questions 1, 3, 6, 7, 8, and 9; Section VII, questions 1 and 2; Section 8, question 2; Section IX, questions 1, 3, and 4, or lack of signed medical authorizations.” Paragraph 3 further requires a signed verification.

In addition, the instructions on the PFS form prohibit leaving spaces blank and provide as follows: “If a question is not applicable to you, please state ‘Not Applicable’ or ‘N/A.’” In our review, many deficiencies resulted from a plaintiff leaving one or more spaces blank.

Pursuant to paragraph 6 of PTO 14, within 3 weeks of the date of this letter, you must respond in writing by either (1) curing the deficiencies (by serving a further revised, verified PFS through Plaintiffs’ portal); (2) disputing the deficiencies and setting forth the reasons the PFS is not deficient; or (3) explaining why the deficiencies cannot be timely cured. When serving a revised, PFS through Plaintiff’s portal, you do not need to resubmit documents that were previously served with the original and/or any amended PFS. An updated verification is required, however, to be served along with the amended PFS.

Sincerely,

s/ Benjamin W. Hulse

Benjamin W. Hulse

cc: Plaintiffs’ Co-Lead Counsel  
Enclosure

Title "Gruetzmacher\_Laura\_017-cv-00998\_1\_Gruetzmacher\_Laura\_017-cv-00998\_1"

Gruetzmacher\_Laura  
\_017-cv-  
00998\_1\_Gruetzmache  
r\_Laura\_017-cv-  
00998\_1

PLAINTIFFS' LAST NAME - Gruetzmacher  
PLAINTIFFS' FIRST NAME - Laura  
CASE NO. - 0:17-cv-00998  
SECTION I (CASE INFORMATION) -  
SECTION II (PERSONAL INFORMATION) - Incomplete  
SECTION II - INCOMPLETE QUESTIONS - 01, 02, 03, 07, 08, 09  
SECTION III (SURGERY INFORMATION) -  
SECTION IV - 1 (VITAL STATISTICS) -  
SECTION IV - 10 (DRUG/ALCOHOL) -  
SECTION IV - 3 (HEALTHCARE PROVIDERS) -  
SECTION IV - 7 (PHARMACIES/DRUGSTORES) - Incomplete  
SECTION IV - 8 (DENTAL PROCEDURES) -  
SECTION IV - 9 (TOBACCO) -  
SECTION IX - 1 (CONSORTIUM NAME ETC.) -  
SECTION IX - 3 (RESIDENCES) -  
SECTION IX - 4 (MARRIED) -  
SECTION V - 5 (DISABILITY CLAIMS) -  
SECTION V - 6 (LAWSUITS) -  
SECTION V - 7 (BANKRUPTCY) -  
SECTION VI - 1 (PHYSICAL INJURY) - Incomplete  
SECTION VI - 3 (EMOTIONAL DISTRESS) -  
SECTION VI - 6 (WARNINGS) -  
SECTION VI - 7 (3M/ARIZANT COMMUNICATIONS) -  
SECTION VI - 8 (3M/ARIZANT WARRANTY) -  
SECTION VI - 9 (AUGUSTINE) -  
SECTION VII - 1 (LOST PAST WAGES) -  
SECTION VII - 2 (LOST FUTURE WAGES) - Incomplete  
SECTION VIII - 2 (VERBAL/WITTEN STATEMENT) -  
X.01 - SIGNED AUTHORIZATION - Incomplete  
X.02.D - DOCUMENTS - SIGNED VERIFICATION - Incomplete  
I.03.B - PLAINTIFFS' COUNSEL'S FIRM - Levin, Papantonio, Thomas, Mitchell, Rafferty, Proctor P.A.  
I.03.E - PLAINTIFFS' COUNSEL'S EMAIL - dnigh@levinlaw.com



Benjamin W. Hulse  
Direct Dial: 612-343-3256  
E-Mail: [bhulse@blackwellburke.com](mailto:bhulse@blackwellburke.com)

October 12, 2017

**VIA EMAIL AND U.S. MAIL**

Daniel A. Nigh  
Levin, Papantonio, Thomas, Mitchell, Rafferty, & Proctor, P.A.  
316 South Baylen St. Suite 400  
Pensacola, Florida 32502  
[dnigh@levinlaw.com](mailto:dnigh@levinlaw.com)

Re: *In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*  
MDL No. 2666 – Deficiencies in Amended Plaintiff Fact Sheet  
*Guzman v. 3M Company* Case No.: 0:17-cv-01017-JNE-FLN

Dear Counsel:

We are in receipt of the second amended Plaintiff Fact Sheet (PFS) for the above-captioned matter. The second amended PFS still has core deficiencies, as set forth in the enclosed report.

Paragraph 4 of Pretrial Order No. 14 defines core deficiencies as “a lack of response to all questions in Section I, Section II, and Section III; Section IV, questions 1, 3, 7, 8, 9, 10; Section V, questions 5, 6, and 7; Section VI, questions 1, 3, 6, 7, 8, and 9; Section VII, questions 1 and 2; Section 8, question 2; Section IX, questions 1, 3, and 4, or lack of signed medical authorizations.” Paragraph 3 further requires a signed verification.

In addition, the instructions on the PFS form prohibit leaving spaces blank and provide as follows: “If a question is not applicable to you, please state ‘Not Applicable’ or ‘N/A.’” In our review, many deficiencies resulted from a plaintiff leaving one or more spaces blank.

Pursuant to paragraph 6 of PTO 14, within 3 weeks of the date of this letter, you must respond in writing by either (1) curing the deficiencies (by serving a further revised, verified PFS through Plaintiffs’ portal); (2) disputing the deficiencies and setting forth the reasons the PFS is not deficient; or (3) explaining why the deficiencies cannot be timely cured. When serving a revised, PFS through Plaintiff’s portal, you do not need to resubmit documents that were previously served with the original and/or any amended PFS. An updated verification is required, however, to be served along with the amended PFS.

Sincerely,

s/ Benjamin W. Hulse

Benjamin W. Hulse

cc: Plaintiffs’ Co-Lead Counsel  
Enclosure

Title "Guzman\_Maria\_017-cv-01017\_1\_Guzman\_Maria\_017-cv-01017\_1"

Guzman\_Maria\_017-  
cv-  
01017\_1\_Guzman\_Mar  
ia\_017-cv-01017\_1

PLAINTIFFS' LAST NAME - Guzman

PLAINTIFFS' FIRST NAME - Maria

CASE NO. - 0:17-cv-01017

SECTION I (CASE INFORMATION) -

SECTION II (PERSONAL INFORMATION) - Incomplete

SECTION II - INCOMPLETE QUESTIONS - 01, 02, 03, 05, 06, 09, 10

SECTION III (SURGERY INFORMATION) -

SECTION IV - 1 (VITAL STATISTICS) -

SECTION IV - 10 (DRUG/ALCOHOL) -

SECTION IV - 3 (HEALTHCARE PROVIDERS) -

SECTION IV - 7 (PHARMACIES/DRUGSTORES) -

SECTION IV - 8 (DENTAL PROCEDURES) -

SECTION IV - 9 (TOBACCO) -

SECTION IX - 1 (CONSORTIUM NAME ETC.) -

SECTION IX - 3 (RESIDENCES) -

SECTION IX - 4 (MARRIED) -

SECTION V - 5 (DISABILITY CLAIMS) -

SECTION V - 6 (LAWSUITS) -

SECTION V - 7 (BANKRUPTCY) -

SECTION VI - 1 (PHYSICAL INJURY) - Incomplete

SECTION VI - 3 (EMOTIONAL DISTRESS) -

SECTION VI - 6 (WARNINGS) -

SECTION VI - 7 (3M/ARIZANT COMMUNICATIONS) -

SECTION VI - 8 (3M/ARIZANT WARRANTY) -

SECTION VI - 9 (AUGUSTINE) -

SECTION VII - 1 (LOST PAST WAGES) -

SECTION VII - 2 (LOST FUTURE WAGES) -

SECTION VIII - 2 (VERBAL/WRITTEN STATEMENT) -

X.01 - SIGNED AUTHORIZATION - Incomplete

X.02.D - DOCUMENTS - SIGNED VERIFICATION - Incomplete

I.03.B - PLAINTIFFS' COUNSEL'S FIRM - Levin, Papantonio, Thomas, Mitchell, Rafferty, Proctor P.A.

I.03.E - PLAINTIFFS' COUNSEL'S EMAIL - dnigh@levinlaw.com



**From:** Ben Hulse

**Sent:** Tuesday, November 14, 2017 4:12 PM

**To:** 'JoanEricksen\_Chambers@mnd.uscourts.gov' <[JoanEricksen\\_Chambers@mnd.uscourts.gov](mailto:JoanEricksen_Chambers@mnd.uscourts.gov)>;  
'Noel\_Chambers@mnd.uscourts.gov' <[Noel\\_Chambers@mnd.uscourts.gov](mailto:Noel_Chambers@mnd.uscourts.gov)>

**Cc:** Jerry Blackwell <[blackwell@blackwellburke.com](mailto:blackwell@blackwellburke.com)>; Bridget Ahmann  
<[Bridget.Ahmann@FaegreBD.com](mailto:Bridget.Ahmann@FaegreBD.com)>; 'gzimmerman@meshbesh.com'  
<[gzimmerman@meshbesh.com](mailto:gzimmerman@meshbesh.com)>; 'bgordon@levinlaw.com' <[bgordon@levinlaw.com](mailto:bgordon@levinlaw.com)>;  
'MVC@ciresiconlin.com' <[MVC@ciresiconlin.com](mailto:MVC@ciresiconlin.com)>; 'JMC@CiresiConlin.com' <[JMC@CiresiConlin.com](mailto:JMC@CiresiConlin.com)>;  
'David J. Szerlag' <[david@pritzkerlaw.com](mailto:david@pritzkerlaw.com)>; 'Wendy Thayer' <[wendy@pritzkerlaw.com](mailto:wendy@pritzkerlaw.com)>

**Subject:** Bair Hugger, MDL 2666 -- Defendants' lists of PFS disputes for November 2017

Dear Judge Ericksen,

Even though this month's status conference has been cancelled, Defendants would still like to list cases with Plaintiff Fact Sheet disputes, as provided by PTO 14, paragraph 7, Dkt. No. 117.

In October, the Court ordered that PFS disputes were deemed "addressed to the Court" notwithstanding the cancellation of the in-court conference. (Dkt. No. 959.) Defendants request the same for this month.

Best regards,  
Ben Hulse  
Counsel for Defendants

Benjamin W. Hulse  
Blackwell Burke P.A.  
431 South Seventh Street, Suite 2500  
Minneapolis, MN 55415  
Direct (612) 343-3256  
Fax (612) 343-3205

This message and any attachments may contain information that is privileged, confidential, and exempt from disclosure under applicable law. If you are not the intended recipient or are not authorized to receive for the recipient, you are hereby notified that dissemination, distribution or copying of this message and any attachments is strictly prohibited. If you have received this message in error, please immediately advise the sender by reply e-mail and delete the message and any attachments. Thank you.

**Defendants' PFS List 1: Overdue Plaintiff Fact Sheets**  
(Created November 14, 2017)

Case Number	Title	Date Filed	Due Date	Comments	Prior Listing	Firm Name
<a href="#">0:17-cv-01441-JNE-FLN</a>	Morgan v. 3M Company et al	5/1/2017	7/30/2017		8/10/2017 9/07/2017 10/13/2017	Bernstein Liebhard LLP
<a href="#">0:17-cv-03008-JNE-FLN</a>	Toland v. 3M Company et al	7/17/2017	8/8/2017 8/14/2017; 9/13/2017	Defendants granted Plaintiff two extensions.	10/13/2017	Brown & Crouppen, PC
<a href="#">0:17-cv-02395-JNE-FLN</a>	Hecht, Theodore v. 3M Company et al	6/29/2017	9/27/2017		10/13/2017	Kirtland & Packard LLP
<a href="#">0:17-cv-02394-JNE-FLN</a>	Mucci v. 3M Company et al	6/29/2017	9/27/2017		10/13/2017	Kirtland & Packard LLP
<a href="#">0:17-cv-02685-JNE-FLN</a>	Daniels et al v. 3M Company et al	7/10/2017	10/8/2017			Brown & Crouppen, PC
<a href="#">0:17-cv-02747-JNE-FLN</a>	Graves v. 3M Company et al	7/11/2017	10/9/2017			The Olinde Firm, LLC
<a href="#">0:17-cv-02738-JNE-FLN</a>	Allen v. 3M Company et al	7/11/2017	10/9/2017			The Olinde Firm, LLC
<a href="#">0:17-cv-02755-JNE-FLN</a>	Morris v. 3M Company et al	7/11/2017	10/9/2017			Kennedy Hodges, LLP
<a href="#">0:17-cv-02881-JNE-FLN</a>	Prince v. 3M Company et al	7/13/2017	10/11/2017			Bernstein Liebhard LLP
<a href="#">0:17-cv-02853-JNE-FLN</a>	Wallis v. 3M Company et al	7/13/2017	10/11/2017			Bernstein Liebhard LLP
<a href="#">0:17-cv-02892-JNE-FLN</a>	Saylor v. 3M Company et al	7/14/2017	10/12/2017			The Olinde Firm, LLC
<a href="#">0:17-cv-03037-JNE-FLN</a>	Flowers v. 3M Company et al	7/18/2017	10/16/2017			Kennedy Hodges, LLP
<a href="#">0:17-cv-03038-JNE-FLN</a>	Schapansky v. 3M Company et al	7/18/2017	10/16/2017			Kennedy Hodges, LLP
<a href="#">0:17-cv-03112-JNE-FLN</a>	Depew v. 3M Company et al	7/19/2017	10/17/2017			Kirtland & Packard LLP
<a href="#">0:17-cv-03078-JNE-FLN</a>	Torres v. 3M Company et al	7/19/2017	10/17/2017			Kennedy Hodges, LLP
<a href="#">0:17-cv-03556-JNE-FLN</a>	Clausen et al v. 3M Company et al	8/4/2017	11/2/2017			Hare, Wynn, Newell & Newton

Yellow highlighting indicates that the case was previously listed per PTO 14 (Dkt. No. 270).



## Defendants' PFS List 2: Plaintiffs Who Have Not Responded to Defendants' Deficiency Notices

(Created November 14, 2017)

Case Number	Title	1st Deficiency Notice Sent	Response Due Date	Prior Listing	Firm Name
<a href="#">0:17-cv-01706-JNE-FLN</a>	Price et al v. 3M Company et al	9/18/2017	10/09/2017		Walters Law Firm, LLC
<a href="#">0:17-cv-01879-JNE-FLN</a>	Sellers v. 3M Company et al	9/28/2017	10/19/2017		Kennedy Hodges, LLP
<a href="#">0:17-cv-01493-JNE-FLN</a>	Grussing v. 3M Company et al	10/11/2017	11/1/2017		Hendrickson Law
<a href="#">0:17-cv-01027-JNE-FLN</a>	Warren v. 3M Company et al	10/12/2017	11/2/2017		Bernstein Liebhard LLP
0:17-cv-01494-JNE-FLN	Six v. 3M Company et al	10/12/2017	11/2/2017		Hendrickson Law
<a href="#">0:17-cv-02099-JNE-FLN</a>	Osborne v. 3M Company et al	10/12/2017	11/2/2017		Kennedy Hodges, LLP
Case Number	Title	2nd Deficiency Notice Sent	Response Due Date		Firm Name
<a href="#">0:17-cv-00286-JNE-FLN</a>	Charles v. 3M Company et al.	8/14/2017	9/4/2017	9/7/2017 10/13/2017	The Law offices of Travis R. Walker, PA
<a href="#">0:17-cv-01082-JNE-FLN</a>	Petrakis v. 3M Company et al	9/18/2017	10/9/2017		Kennedy Hodges, L.L.P.
<a href="#">0:17-cv-01330-JNE-FLN</a>	Yarbrough v. 3M Company	9/27/2017	10/18/2017		Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
<a href="#">Case Number</a>	Title	3rd Deficiency Notice Sent	Response Due Date	Prior Listing	Firm Name
<a href="#">0:17-cv-00288-JNE-FLN</a>	Bradford v. 3M Company et al	9/29/2017	10/20/2017		The Law offices of Travis R. Walker, PA



## Defendants' PFS List 3: Core Deficiencies Remained Following Notice and Response

(Created November 14, 2017)

Case Number	Title	3rd Deficiency Sent	Prior Listing	Firm Name
<a href="#">0:15-cv-03951-JNE-FLN</a>	Hernandez v. 3M Company et al	4/11/2017	6/9/2017 07/14/2017 08/11/2017 09/07/2017 10/13/2017	The Law offices of Travis R. Walker, PA
<a href="#">0:15-cv-04004-JNE-FLN</a>	Peterson v. 3M Company	4/4/2017	4/14/2017; 6/09/2017 7/14/2017 10/13/2017	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
<a href="#">0:16-cv-01153-JNE-FLN</a>	Surgeon v. 3M Company	4/20/2017	6/9/2017 07/14/2017 10/13/2017	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
<a href="#">0:16-cv-01155-JNE-FLN</a>	Sutter v. 3M Company	4/21/2017	6/9/2017 07/14/2017 10/13/2017	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
<a href="#">0:16-cv-02663-JNE-FLN</a>	McKevitt et al v. 3M Company Inc et al	4/4/2017	06/09/2017 07/14/2017 08/11/2017 09/07/2017 10/13/2017	Brown & Crouppen, PC
<a href="#">0:16-cv-03329-JNE-FLN</a>	Gray v. 3M Company et al	5/4/2017	06/09/2017 07/14/2017 10/13/2017	Kirtland & Packard LLP
<a href="#">0:16-cv-03618-JNE-FLN</a>	Messner-Katzer v. 3M Company et al	5/16/2017	06/09/2017 07/14/2017 08/11/2017 09/07/2017 10/13/2017	<a href="mailto:jcapretz@capretz.com">jcapretz@capretz.com</a>
<a href="#">0:16-cv-04154-JNE-FLN</a>	Pavlovic v. 3M Company	6/29/2017	6/9/2017 07/14/2017 10/13/2017	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
<a href="#">0:17-cv-01134-JNE-FLN</a>	Newman v. 3M Company et al	7/13/2017	07/14/2017 08/11/2017 09/07/2017 10/13/2017	Brown & Crouppen, PC
<a href="#">0:16-cv-01364-JNE-FLN</a>	Vernal v. 3M Company	4/18/2017		Langdon & Emison
<a href="#">0:16-cv-02298-JNE-FLN</a>	Dandrea et al v. 3M Company et al	4/19/2017		Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
<a href="#">0:16-cv-02428-JNE-FLN</a>	King v. 3M Company et al	4/19/2017		Kennedy Hodges, LLP
<a href="#">0:16-cv-02957-JNE-FLN</a>	Zivanovich v. 3M Company	4/24/2017		Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA

## Defendants' PFS List 3: Core Deficiencies Remained Following Notice and Response

(Created November 14, 2017)

<a href="#">0:16-cv-04038-JNE-FLN</a>	Bell-Young v. 3M Company et al	6/20/2017		Kirtland & Packard LLP
<a href="#">0:16-cv-04161-JNE-FLN</a>	Bond v. 3M Company	6/30/2017		Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
<a href="#">0:17-cv-00343-JNE-FLN</a>	Grooms v. 3M Company	8/24/2017		Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
<a href="#">0:17-cv-00570-JNE-FLN</a>	Harrison v. 3M Company	9/1/2017	10/13/2017	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
<a href="#">0:17-cv-00640-JNE-FLN</a>	Johnson v. 3M Company et al	10/3/2017		Brown & Crouppen, PC
<a href="#">0:17-cv-00711-JNE-FLN</a>	Garcia v. 3M Company	10/16/2017		Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
<a href="#">0:17-cv-00998-JNE-FLN</a>	Gruetzmacher v. 3M Company	10/16/2017		Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
<a href="#">0:17-cv-01017-JNE-FLN</a>	Guzman v. 3M Company	10/16/2017		Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
<a href="#">0:17-cv-01389-JNE-FLN</a>	Cooper et al v. 3M Company et al	10/11/2017		Brown & Crouppen, PC
<a href="#">0:17-cv-02194-JNE-FLN</a>	Schriewer et al v. 3M Company et al	10/12/2017		Brown & Crouppen, PC
<a href="#">0:17-cv-02212-JNE-FLN</a>	Smith, Leonard	10/12/2017		Brown & Crouppen, PC
<a href="#">0:17-cv-02254-JNE-FLN</a>	Snider et al v. 3M Company et al	10/12/2017		Brown & Crouppen, PC
<a href="#">0:17-cv-02296-JNE-FLN</a>	Weiner-Tuskes et al v. 3M Company et al	10/12/2017		Brown & Crouppen, PC
<a href="#">0:17-cv-02300-JNE-FLN</a>	Young v. 3M Company et al	10/12/2017		Brown & Crouppen, PC
<a href="#">0:17-cv-02301-JNE-FLN</a>	Stokes v. 3M Company et al	10/12/2017		Brown & Crouppen, PC
<a href="#">0:17-cv-02305-JNE-FLN</a>	Wooden et al v. 3M Company et al	10/12/2017		Brown & Crouppen, PC
<a href="#">0:17-cv-02309-JNE-FLN</a>	Smith et al v. 3M Company et al	10/12/2017		Brown & Crouppen, PC



**From:** Ben Hulse

**Sent:** Monday, December 18, 2017 2:20 PM

**To:** 'JoanEricksen\_Chambers@mnd.uscourts.gov' <[JoanEricksen\\_Chambers@mnd.uscourts.gov](mailto:JoanEricksen_Chambers@mnd.uscourts.gov)>; 'Noel\_Chambers@mnd.uscourts.gov' <[Noel\\_Chambers@mnd.uscourts.gov](mailto:Noel_Chambers@mnd.uscourts.gov)>; 'Leary, William (Judge)' <[William.Leary@courts.state.mn.us](mailto:William.Leary@courts.state.mn.us)>

**Cc:** Jerry Blackwell <[blackwell@blackwellburke.com](mailto:blackwell@blackwellburke.com)>; 'Ahmann, Bridget M.' <[Bridget.Ahmann@FaegreBD.com](mailto:Bridget.Ahmann@FaegreBD.com)>; 'gzimmerman@meshbesh.com' <[gzimmerman@meshbesh.com](mailto:gzimmerman@meshbesh.com)>; 'bgordon@levinlaw.com' <[bgordon@levinlaw.com](mailto:bgordon@levinlaw.com)>; 'MVC@ciresiconlin.com' <[MVC@ciresiconlin.com](mailto:MVC@ciresiconlin.com)>; 'JMC@CiresiConlin.com' <[JMC@CiresiConlin.com](mailto:JMC@CiresiConlin.com)>; Mary Young <[myoung@blackwellburke.com](mailto:myoung@blackwellburke.com)>

**Subject:** Joint Agenda and Status Report for December 21 Status Conference (MDL No. 15-2666 (JNE/FLN))

Dear Judge Ericksen and Judge Noel,

In accordance with Pretrial Order No. 3, the parties submit this Joint Agenda and Status Conference Report in preparation for the status conference scheduled for Thursday, December 21, at 9:30 a.m. We apologize for the delay in make this submission.

Defendants' three lists related to the Plaintiff Fact Sheets, as discussed in Section 2 of the Joint Agenda, are also attached to this email. Defendants' proposed pretrial order concerning the process for substitutions for deceased plaintiffs, referenced in Section 6, is also attached. As noted in the Joint Agenda, Plaintiffs will oppose entry of that proposed order.

We have copied Judge Leary here as well.

Best regards,  
Ben Hulse

Benjamin W. Hulse  
Blackwell Burke P.A.  
431 South Seventh Street, Suite 2500  
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**Defendants' PFS List 1: Overdue Plaintiff Fact Sheets**  
(Updated December 15, 2017)

Case Number	Title	Date Filed	Due Date	Comments	Prior Listing	Firm Name
<a href="#">0:17-cv-01441-JNE-FLN</a>	Morgan v. 3M Company et al	5/1/2017	7/30/2017		8/10/2017 9/07/2017 10/13/2017 11/07/2017	Bernstein Liebhard LLP
<a href="#">0:17-cv-02747-JNE-FLN</a>	Graves v. 3M Company et al	7/11/2017	10/9/2017		11/7/2017	The Olinde Firm, LLC
<a href="#">0:17-cv-02738-JNE-FLN</a>	Allen v. 3M Company et al	7/11/2017	10/9/2017		11/7/2017	The Olinde Firm, LLC
<a href="#">0:17-cv-02755-JNE-FLN</a>	Morris v. 3M Company et al	7/11/2017	10/9/2017		11/7/2017	Kennedy Hodges, L.L.P
<a href="#">0:17-cv-02763-JNE-FLN</a>	Maxheimer v. 3M Company et al	7/11/2017	10/9/2017		11/7/2017	Kennedy Hodges, L.L.P
<a href="#">0:17-cv-02881-JNE-FLN</a>	Prince v. 3M Company et al	7/13/2017	10/11/2017		11/7/2017	Bernstein Liebhard LLP
<a href="#">0:17-cv-02853-JNE-FLN</a>	Wallis v. 3M Company et al	7/13/2017	10/11/2017		11/7/2017	Bernstein Liebhard LLP
<a href="#">0:17-cv-02892-JNE-FLN</a>	Saylor v. 3M Company et al	7/14/2017	10/12/2017		11/7/2017	The Olinde Firm, LLC
<a href="#">0:17-cv-03038-JNE-FLN</a>	Schapansky v. 3M Company et al	7/18/2017	10/16/2017		11/7/2017	Kennedy Hodges, L.L.P
<a href="#">0:17-cv-03103-JNE-FLN</a>	Ghidella v. 3M Company et al	7/19/2017	10/17/2017			Kennedy Hodges, L.L.P
<a href="#">0:17-cv-03187-JNE-FLN</a>	Gawthorp v. 3M Company et al	7/21/2017	10/19/2017			Kennedy Hodges, L.L.P
<a href="#">0:17-cv-03252-JNE-FLN</a>	Gorbett v. 3M Company et al	7/23/2017	10/21/2017			Bernstein Liebhard LLP
<a href="#">0:17-cv-03380-JNE-FLN</a>	Rowan v. 3M Company et al	7/27/2017	10/24/2017			Bernstein Liebhard LLP
<a href="#">0:17-cv-03414-JNE-FLN</a>	Towsley v. 3M Company et al	7/27/2017	10/25/2017			Sexton & Shelor
<a href="#">0:17-cv-03413-JNE-FLN</a>	Williams, Wanda v. 3M Company, et al	7/28/2017	10/26/2017			Sexton & Shelor
<a href="#">0:17-cv-03441-JNE-FLN</a>	Landers v. 3M Company et al	7/28/2017	10/26/2017			Kirtland and Packard LLP
<a href="#">0:17-cv-03440-JNE-FLN</a>	Williams v. 3M Company et al	7/31/2017	10/29/2017			Kirtland and Packard LLP
<a href="#">0:17-cv-03573-JNE-FLN</a>	Parker v. 3M Company et al	8/4/2017	11/2/2017			Bernstein Liebhard LLP
<a href="#">0:17-cv-03658-JNE-FLN</a>	Beach v. 3M Company et al	8/9/2017	11/7/2017			Bernstein Liebhard LLP
<a href="#">0:17-cv-03679-JNE-FLN</a>	Elliott, Steve v. 3M Company et al	8/11/2017	11/9/2017			Bernstein Liebhard LLP
<a href="#">0:17-cv-03811-JNE-FLN</a>	Pope v. 3M Company et al	8/17/2017	11/15/2017			Kirtland and Packard LLP
<a href="#">0:17-cv-03819-JNE-FLN</a>	Mazer v. 3M Company et al	8/18/2017	11/15/2017			Hollis Legal Solutions, PLLC
<a href="#">0:17-cv-03823-JNE-FLN</a>	Miller, Carol v. 3M Company et al	8/18/2017	11/15/2017			Bernstein Liebhard LLP



**Defendants' PFS List 1: Overdue Plaintiff Fact Sheets**  
(Updated December 15, 2017)

Case Number	Title	Date Filed	Due Date	Comments	Prior Listing	Firm Name
<a href="#">0:17-cv-03868-JNE-FLN</a>	Montgomery, Harold et al v. 3M Company et al	8/22/2017	11/19/2017			Schlichter Bogard & Denton, LLP
<a href="#">0:17-cv-03895-JNE-FLN</a>	Loving v. 3M Company et al	8/23/2017	11/20/2017			Kennedy Hodges
<a href="#">0:17-cv-03937-JNE-FLN</a>	Siegel v. 3M Company et al	8/24/2017	11/21/2017			Bernstein Liebhard LLP
<a href="#">0:17-cv-03948-JNE-FLN</a>	Gilliam et al v. 3M Company et al	8/25/2017	11/23/2017			Brent Coon & Associates
<a href="#">0:17-cv-03950-JNE-FLN</a>	Jacks et al v. 3M Company et al	8/25/2017	11/23/2017			Brent Coon & Associates
<a href="#">0:17-cv-03952-JNE-FLN</a>	Pratt et al v. 3M Company et al	8/25/2017	11/23/2017			Brent Coon & Associates
<a href="#">0:17-cv-03956-JNE-FLN</a>	Reeves v. 3M Company et al	8/25/2017	11/23/2017			Kennedy Hodges
<a href="#">0:17-cv-03954-JNE-FLN</a>	Rietz et al v. 3M Company et al	8/25/2017	11/23/2017			Brent Coon & Associates
<a href="#">0:17-cv-03962-JNE-FLN</a>	Sale et al v. 3M Company et al	8/25/2017	11/23/2017			Brent Coon & Associates
<a href="#">0:17-cv-03964-JNE-FLN</a>	Taylor, Whitney and Pat et al v. 3M Company et al	8/25/2017	11/23/2017			Brent Coon & Associates
<a href="#">0:17-cv-03994-JNE-FLN</a>	Cook, Delores v. 3M Company et al	8/25/2017	11/23/2017			Bernstein Liebhard LLP
<a href="#">0:17-cv-03997-JNE-FLN</a>	Keith, Wesley v. 3M Company et al	8/28/2017	11/25/2017			The Miller Firm, LLC
<a href="#">0:17-cv-04005-JNE-FLN</a>	Salazar v. 3M Company et al	8/28/2017	11/25/2017			Kirtland and Packard LLP
<a href="#">0:17-cv-04028-JNE-FLN</a>	Allagas v. Arizant Healthcare, Inc. et al	8/29/2017	11/26/2017			Kirtland and Packard LLP
<a href="#">0:17-cv-04009-JNE-FLN</a>	Rude v. 3M Company et al	8/30/2017	11/27/2017			Bernstein Liebhard LLP
<a href="#">0:17-cv-04043-JNE-FLN</a>	Ground v. 3M Company et al	8/30/2017	11/27/2017			Bernstein Liebhard LLP
<a href="#">0:17-cv-04094-JNE-FLN</a>	O'Connell v. 3M Company et al	8/31/2017	11/28/2017			Bachus & Schanker, LLC
<a href="#">0:17-cv-04084-JNE-FLN</a>	Pemberton, Debora v. 3M Company et al	8/31/2017	11/28/2017			Bernstein Liebhard LLP
<a href="#">0:17-cv-04065-JNE-FLN</a>	Smigla v. 3M Company et al	8/31/2017	11/28/2017			Bernstein Liebhard LLP
<a href="#">0:17-cv-04143-JNE-FLN</a>	Gregovich v. 3M Company et al	9/5/2017	12/4/2017			Kirtland and Packard LLP
<a href="#">0:17-cv-04145-JNE-FLN</a>	Harper v. 3M Company et al	9/5/2017	12/4/2017			Kirtland and Packard LLP

**Defendants' PFS List 1: Overdue Plaintiff Fact Sheets**  
(Updated December 15, 2017)

Case Number	Title	Date Filed	Due Date	Comments	Prior Listing	Firm Name
<a href="#"><u>0:17-cv-04148-JNE-FLN</u></a>	Thomas, Collin et al v. 3M Company et al	9/6/2017	12/5/2017			Bachus & Schanker, LLC
<a href="#"><u>0:17-cv-04158-JNE-FLN</u></a>	Young, Debra v. 3M Company et al	9/7/2017	12/6/2017			Kirtland and Packard LLP
<a href="#"><u>0:17-cv-04177-JNE-FLN</u></a>	Butler, James v. 3M Company et al	9/7/2017	12/6/2017			Kennedy Hodges
<a href="#"><u>0:17-cv-04182-JNE-FLN</u></a>	Roberts, Carol v. 3M Company et al	9/7/2017	12/6/2017			Kirtland and Packard LLP
<a href="#"><u>0:17-cv-04230-JNE-FLN</u></a>	Metivier v. 3M Company et al	9/12/2017	12/11/2017			Kirtland and Packard LLP
<a href="#"><u>0:17-cv-03941-JNE-FLN</u></a>	Martinez v. 3M Company et al	8/24/2017	11/29/2017			DeGaris & Rogers, LLC
<a href="#"><u>0:17-cv-03925-JNE-FLN</u></a>	Smith, June v. 3M Company et al	8/24/2017	11/29/2017			DeGaris & Rogers, LLC



**Defendants' PFS List 2: Plaintiffs Who Have Not Responded to Defendants' Deficiency Notices**  
(Updated December 15, 2017)

Case Number	Title	1st Deficiency Notice Sent	Response Due Date	Prior Listing	Firm Name
<a href="#">0:17-cv-01879-JNE-FLN</a>	Sellers v. 3M Company et al	9/28/2017	10/19/2017	11/7/2017	Kennedy Hodges, L.L.P.
<a href="#">0:17-cv-01027-JNE-FLN</a>	Warren v. 3M Company et al	10/12/2017	11/2/2017	11/7/2017	Bernstein Liebhard LLP
<a href="#">0:17-cv-02099-JNE-FLN</a>	Osborne v. 3M Company et al	10/12/2017	11/2/2017	11/7/2017	Kennedy Hodges, L.L.P.
<a href="#">0:17-cv-02231-JNE-FLN</a>	Nunn v. 3M Company et al	10/18/2017	11/8/2017		Kennedy Hodges, L.L.P.
<a href="#">0:17-cv-02319-JNE-FLN</a>	Taylor, Mary v. 3M Company et al	10/24/2017	11/15/2017		Kennedy Hodges, L.L.P.
<a href="#">0:17-cv-02383-JNE-FLN</a>	Blancett v. 3M Company et al	10/25/2017	11/16/2017		Kennedy Hodges, L.L.P.
<a href="#">0:17-cv-02415-JNE-FLN</a>	Pickett v. 3M Company et al	10/25/2017	11/16/2017		Kennedy Hodges, L.L.P.
<a href="#">0:17-cv-02452-JNE-FLN</a>	Suchan v. 3M Company et al	10/25/2017	11/16/2017		Kennedy Hodges, L.L.P.
<a href="#">0:17-cv-02589-JNE-FLN</a>	Rashad v. 3M Company et al	10/31/2017	11/21/2017		Kennedy Hodges, L.L.P.
<a href="#">0:17-cv-02642-JNE-FLN</a>	Richey v. 3M Company et al	11/2/2017	11/23/2017		Kennedy Hodges, L.L.P.
<a href="#">0:17-cv-02726-JNE-FLN</a>	McCall v. 3M Company et al	11/7/2017	11/28/2017		Kennedy Hodges, L.L.P.
<a href="#">0:17-cv-02745-JNE-FLN</a>	Devries v. 3M Company et al	11/6/2017	11/27/2017		The Olinde Firm, LLC
<a href="#">0:17-cv-03795-JNE-FLN</a>	Winston v. 3M Company et al	11/8/2017	11/29/2017		Bachus & Schanker, LLC
<a href="#">0:17-cv-03101-JNE-FLN</a>	Perry v. 3M Company et al	11/14/2017	12/5/2017		Kennedy Hodges, L.L.P.
<a href="#">0:17-cv-03233-JNE-FLN</a>	McLaughlin v. 3M Company et al	11/17/2017	12/8/2017		Kennedy Hodges, L.L.P.
Case Number	Title	2nd Deficiency Notice Sent	Response Due Date		Firm Name
<a href="#">0:17-cv-00286-JNE-FLN</a>	Charles v. 3M Company et al.	8/14/2017	9/4/2017	9/7/2017 10/13/2017 11/07/2017	The Law offices of Travis R. Walker, P.A
<a href="#">0:17-cv-01082-JNE-FLN</a>	Petrakis v. 3M Company et al	9/18/2017	10/9/2017	11/7/2017	Kennedy Hodges, L.L.P.
<a href="#">0:17-cv-01122-JNE-FLN</a>	Griggs v. 3M Company et al	10/25/2017	11/15/2017		The Olinde Firm, LLC
<a href="#">0:17-cv-01731-JNE-FLN</a>	Ethelbah v. 3M Company et al	11/14/2017	12/5/2017		Lockridge, Grindal Nauen P.L.L.P.
<a href="#">0:16-cv-04381-JNE-FLN</a>	Manzanares v. 3M Company et al	11/20/2017	12/11/2017		Bernstein Liebhard LLP





## Defendants' PFS List 3: Core Deficiencies Remained Following Notice and Response

(Updated December 15, 2017)

Case Number	Title	3rd Deficiency Sent	Prior Listing	Firm Name
<a href="#">0:16-cv-03618-JNE-FLN</a>	Messner-Katzer v. 3M Company et al	5/16/2017	06/09/2017 07/14/2017 08/11/2017 09/07/2017 10/13/2017	Capretz & Associates
<a href="#">0:17-cv-00343-JNE-FLN</a>	Grooms v. 3M Company	8/24/2017	11/7/2017	Levin, Papantonio, Thomas, Mitchell, Rafferty, Proctor P.A.
<a href="#">0:17-cv-00570-JNE-FLN</a>	Harrison v. 3M Company	9/1/2017	10/13/2017 11/7/2017	Levin, Papantonio, Thomas, Mitchell, Rafferty, Proctor P.A.
<a href="#">0:17-cv-00640-JNE-FLN</a>	Johnson v. 3M Company et al	10/3/2017	11/7/2017	Levin, Papantonio, Thomas, Mitchell, Rafferty, Proctor P.A.
<a href="#">0:17-cv-00711-JNE-FLN</a>	Garcia v. 3M Company	10/16/2017	11/7/2017	Levin, Papantonio, Thomas, Mitchell, Rafferty, Proctor P.A.
<a href="#">0:17-cv-00998-JNE-FLN</a>	Gruetzmacher v. 3M Company	10/16/2017	11/7/2017	Levin, Papantonio, Thomas, Mitchell, Rafferty, Proctor P.A.
<a href="#">0:17-cv-01017-JNE-FLN</a>	Guzman v. 3M Company	10/16/2017	11/7/2017	Levin, Papantonio, Thomas, Mitchell, Rafferty, Proctor P.A.
<a href="#">0:17-cv-02212-JNE-FLN</a>	Smith, Leonard	10/12/2017	11/7/2017	Brown & Crouppen, PC
<a href="#">0:16-cv-03991-JNE-FLN</a>	Overko v. 3M Company	6/30/2017		Levin, Papantonio, Thomas, Mitchell, Rafferty, Proctor P.A.
<a href="#">0:17-cv-01139-JNE-FLN</a>	Husman v. 3M Company	11/1/2017		Levin, Papantonio, Thomas, Mitchell, Rafferty, Proctor P.A.
<a href="#">0:17-cv-01407-JNE-FLN</a>	Jadwin et al v. 3M Company et al	11/8/2017		Brown and Crouppen, P.C.
<a href="#">0:17-cv-01323-JNE-FLN</a>	Peters v. 3M Company	11/13/2017		Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, P.A
<a href="#">0:17-cv-01215-JNE-FLN</a>	Pickens v. 3M Company	11/13/2017		Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, P.A
<a href="#">0:17-cv-01250-JNE-FLN</a>	Sparks v. 3M Company	11/13/2017		Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, P.A



KIMBERLY LAMBERT ADAMS  
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DAVID H. LEVIN (1928-2002)  
STANLEY B. LEVIN (1938-2009)

September 12, 2017

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SEP 14 2017

BY: .....CK.....

**VIA FEDEX**

Benjamin W. Hulse  
Blackwell Burke P.A.  
431 South Seventh Street  
Suite 2500  
Minneapolis, MN 55415  
bhulse@blackwellburke.com

Re: *In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*  
MDL No. 2666 – Deficiencies in Plaintiff Fact Sheet for Individual Case  
*Grooms vs. 3M Company*, Case No. 0:17-cv-00343-JNE-FLN

Dear Counsel:

Pursuant to paragraph 6 of PTO 14, please see attached documentation to cure deficiencies for the above captioned case.

Sincerely,

Daniel A. Nigh

DAN/ec  
Enclosure

Response to Deficiencies

*Grooms vs. 3M Company*, Case No. 0:17-cv-00343-JNE-FLN

---

**As of today's date, Tuesday, September 12, 2017, we have been unable to reach client to get deficiency questions answered.**





KIMBERLY LAMBERT ADAMS  
BRIAN H. BARR  
MICHAEL C. BIXBY  
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November 1, 2017

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**VIA FEDEX**

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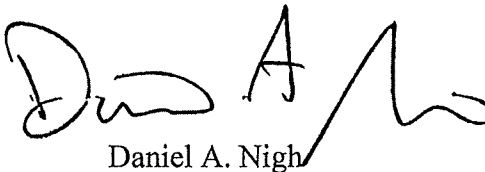
BY: ..... *Cx* .....

Re: *In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*  
MDL No. 2666 – Deficiencies in Plaintiff Fact Sheet for Individual Case  
*Gilbert Garcia v. 3M Company*, Case No. 0:17-cv-00711-JNE-FLN

Dear Counsel:

Pursuant to paragraph 6 of PTO 14, please see attached documentation to cure deficiencies for the above captioned case.

Sincerely,

  
Daniel A. Nigh

DAN/ec  
Enclosure

Response to Deficiencies

*Gilbert Garcia v. 3M Company*, Case No. 0:17-cv-00711-JNE-FLN

---

**Deficiencies cannot be cured at this time as we have not been able to contact client but will continue to make a diligent effort to do so.**



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November 1, 2017

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BY: CK

**VIA FEDEX**

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Re: *In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*  
MDL No. 2666 – Deficiencies in Plaintiff Fact Sheet for Individual Case  
*Laura Gruetzmacher v. 3M Company*, Case No. 0:17-cv-00998-JNE-FLN

Dear Counsel:

Pursuant to paragraph 6 of PTO 14, please see attached documentation to cure deficiencies for the above captioned case.

Sincerely,

Daniel A. Nigh

DAN/ec  
Enclosure

Response to Deficiencies

*Laura Gruetzmacher v. 3M Company*, Case No. 0:17-cv-00998-JNE-FLN

---

**Deficiencies cannot be cured at this time as we have not been able to contact client but will continue to make a diligent effort to do so.**





KIMBERLY LAMBERT ADAMS  
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November 1, 2017

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**VIA FEDEX**

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*Re: In re Bair Hugger Forced Air Warming Devices Products Liability Litigation  
MDL No. 2666 – Deficiencies in Plaintiff Fact Sheet for Individual Case  
Maria Guzman v. 3M Company, Case No. 0:17-cv-01017-JNE-FLN*

Dear Counsel:

Pursuant to paragraph 6 of PTO 14, please see attached documentation to cure deficiencies for the above captioned case.

Sincerely,

*[Handwritten Signature]*  
Daniel A. Nigh

DAN/ec  
Enclosure

Response to Deficiencies

*Maria Guzman v. 3M Company*, Case No. 0:17-cv-01017-JNE-FLN

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**Deficiencies cannot be cured at this time as we have not been able to contact client but will continue to make a diligent effort to do so.**